

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

UNITED STATES OF AMERICA)	
Plaintiff)	Case No. 14 CR 00287-6
v.)	Honorable Judge
)	Charles R. Norgle,
James J. Carroll)	Presiding
Defendant)	

EMERGENCY MOTION TO CONTINUE SENTENCING HEARING

NOW COMES THE DEFENDANT, JAMES CARROLL, by and through his attorney, Jeffrey B. Steinback, and respectfully requests that an order be entered continuing the date of his sentencing hearing for 14 days, or to a later date, consistent with the calendar of this Honorable Court. In support of this motion, the following is stated.

1. Mr. Carroll pled guilty to one charge of bank fraud on February 3, 2018. His sentencing hearing is currently scheduled for May 3, 2022.
2. Defense Counsel, Jeff Steinback, has been working to prepare to go forward with this hearing on the scheduled date.
3. During the last 10 days, Attorney Steinback's granddaughter had a series of health emergencies that have caused Mr. Steinback and his wife to travel out of town to support their son and granddaughter, Julia, who is 12.
4. Julia, is a childhood cancer survivor, and had a grand mal seizure about 10 days ago. Subsequent tests revealed an abnormal EEG and an MRI was

ordered to rule out any further brain involvement i.e., tumors, malignancies, or other causes.

5. Mr. Steinback and his wife have remained with their son and grand daughter to support them through this very difficult time. It is anticipated that they will receive results later today, May 2, 2022. On May 4, 2022, a consult with a Pediatric Neurologist at Mayo Clinic is scheduled for Julia. Depending on what is diagnosed, Mr. Steinback will return to the Chicago area within the next few days.
6. Neither Mr. Steinback, nor Mr. Carroll wish to inconvenience this Honorable Court in any way with this request.
7. Mr. Steinback acknowledges that this Honorable Court and Ms. North have been quite understanding, and that the date of this sentencing was set to be a final date. There is no way that this circumstance, nor the timing of it, could have been anticipated, and except for this extreme and possibly devastating chain of events, he would not be making this request of this Honorable Court.

WHEREFORE, Defendant, James Carroll, by and through his attorney, Jeffrey B, Steinback prays this Honorable Court will grant this request and enter an Order continuing his sentencing date for 14 days, or to a date later, consistent with the calendar of this Court.

Respectfully submitted,

s/ Jeffrey B Steinback

Attorney at Law

8351 Snaresbrook Rd.

Roscoe, IL 61073

847-624-9600

